



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 04, 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred Otto
Robins Restoration Manager
78 CEG/CEANR
775 Macon Street, Building 1555
Robins AFB, Georgia 31098-2201

Dear Mr. Otto:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the following document:

**Construction Completion Report and O&M Plan for LF004 – Landfill No. 4
(SWMU 4): Diversion Ditch Maintenance Improvements (CCR), Revision 0, dated
August 2013.**

EPA determined the CCR for LF004 is adequate for its intended purpose of documenting the construction of revetments within select areas of the LF004 diversion ditch in accordance with the site's Remedial Design/Remedial Action Work Plan (CAPE 2012). However, EPA has provided technical review comments on the CCR, which are enclosed. Addressing the technical review comments will provide specificity regarding the revetment construction activities to the CCR.

The EPA looks forward to working with Robins AFB to resolve these comments. If you have any questions, please contact me at (404) 562-8533.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martha Berry", is written over a horizontal line.

Martha Berry, Senior RPM
NC/SC/GA/KY Federal Oversight Section
Federal Facilities Branch
Superfund Division

Enclosure

cc: Ms. Amy Potter, Georgia Environmental Protection Division

**EPA Comments on
Construction Completion Report and O&M Plan for LF004 – Landfill No. 4 (SWMU 4):
Diversion Ditch Maintenance Improvements (CCR), Revision 0, dated August 2013**

GENERAL COMMENTS

1. The CCR describes the work associated with construction of the revetment systems in the diversion ditch. However, some of the sub-sections, such as Mobilization and Site Preparation, are not included in Table 1-1, Chronology of Principal Construction Activities. For clarity, incorporate all significant events described in Section 3.0 into Table 1-1, along with the appropriate dates.
2. The CCR does not discuss deviations from the Remedial Design/Remedial Action Work Plan for LF004- Landfill 4 (SWMU 4): Diversion Ditch Maintenance Improvements, dated May 2012 (RD/RAWP). The CCR should be revised to include deviations from the RD/RAWP, if any, and how the deviations affected the goals, performance standards and quality of the project.
3. The daily reports included in Appendix C, Field Notes and Daily Reports, indicate a liquid drum is stored in secondary containment in B318; however, this drum is not discussed in the remainder of the CCR. It is not clear what type of liquid was stored in this drum or the final disposition of this liquid. The CCR should be revised to address this issue.

SPECIFIC COMMENTS

1. Section 2.1, Performance Standards, Page 2-1: The second bullet in this section states, "Installing approximately 11,100 square feet (ft²) of geotextile fabric under liner;" however, it is not clear how that geotextile was installed. For example, it is not clear how the geotextile was anchored to the subgrade. The CCR should be revised to include additional details on the installation of the geotextile.
2. Section 3.2.3.1, Subgrade Preparation, Pages 3-2 and 3-3: This section states, "Surface water from the Area 1 outfall was diverted downstream of the construction area using a small earthen berm and a water pump during construction." However, the diversion of surface water from the other areas is not discussed. The CCR should be revised to discuss diversion of water from all areas prior to and during construction.
3. Section 3.2.3.3, Fabriform® Filterpoint Fabric Installation, Page 3-3: This section indicates that the contractor submittal in Appendix E, Contractor Submittal for Fabriform® Filterpoint Fabric, demonstrated the Filterpoint Fabric installed at the site was compliant with the project specifications. However, the project specifications are not included or referenced in the CCR. The CCR should be revised to reference the specifications.
4. Section 3.3, Site Restoration and Demobilization, Page 3-3: The last sentence in this section indicates that grass began sprouting and taking root within one week. However, it is not clear if adequate vegetation was established at all four areas. It is noted that photographs in Appendix B, Construction Photographs, from Areas 2 and 3 appear to show vegetative growth post-construction. The CCR should be revised to confirm adequate vegetative growth has been established at all four Areas. In addition, please provide photographs of the post-construction conditions at Areas 1 and 4.

5. Section 4.0, Final Inspection Documentation, Page 4.1, Paragraph 3: The purpose of this section is to describe the procedures undertaken to document the final inspection of the action. In the third paragraph, this statement is made:

In her e-mail, Ms. Llamas noted that the diversion ditch is not specifically remediating contamination; therefore, a final inspection would not be required and a CCR validating completion of work plan requirements and any punch list items from the pre-final inspection accompanied by sufficient photos to document the completion would suffice for verifying RA completion (Llamas 2013).

EPA requests that this statement be revised to reflect the fact that EPA was not advising that no final inspection was necessary; but that EPA's participation in the final inspection was not a requirement.

6. Appendix B, Construction Photographs: Photos in this section do not have dates/times and are not labeled with the direction of the photo. The CCR should be revised to include the date, time, and direction for each photo, as available.

MINOR COMMENTS

1. Figure 1-2, Diversion Ditch Location Map: In this figure, Area 2 is difficult to see. Though the ground area is small, consider changing the color selection for the 'Lined Areas of the Diversion Ditch' so that areas can be located easily.

2. Section 3.1, Pre-construction Activities, Page 3-1: The first sentence in this section states that pre-construction activities began following award of the AFCEC Task Order. However, no dates are included in this statement. Please include specific dates for these events in the revised CCR.